

Exhibit D

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

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In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

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DO NOT DISCLOSE - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF MATTHEW P. FERMANICH

TAKEN AT: Quarles & Brady
LOCATED AT: 411 East Wisconsin Avenue
Milwaukee, WI

March 27, 2017
9:10 a.m. to 4:13 p.m.
REPORTED BY ANITA K. FOSS
REGISTERED PROFESSIONAL REPORTER

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1 Q. Was Wheaton Franciscan one of your
2 customers?

3 A. It was.

4 Q. And is it still within your district?

5 A. It is.

6 Q. And Wheaton Franciscan-Franklin is
7 located where?

8 A. In Franklin, Wisconsin, which is a south
9 suburb of Milwaukee.

10 Q. And at that facility did you have doctors
11 there that you met with?

12 A. Yes.

13 Q. Who were the doctors?

14 A. Oh, it's changed. Do you have a
15 timeframe that you're --

16 Q. Well --

17 A. -- asking about?

18 Q. Yeah, I'm interested in probably a
19 timeframe the whole time you were there, but if we
20 could narrow around --

21 A. Sure.

22 Q. -- the 2009 through 2012 period.

23 A. Okay. So let's see here. That would
24 have been --

25 Q. And that's only three years.

1 A. You're right. And they've actually had a
2 fair amount of changes.

3 Q. I understand.

4 A. Yeah. So the current group now is MRL
5 Group, the Milwaukee Radiology Group. So that
6 would be -- probably host about ten or twelve
7 different radiologists. Would you like me to list
8 their names?

9 Q. Well, did you know Dr. David Henry?

10 A. I did.

11 Q. And was he among your customers?

12 A. He was.

13 Q. Is he somebody that you've met with?

14 A. He is.

15 Q. And somebody you developed a relationship
16 with?

17 A. I don't know if I would go that far, that
18 I developed a relationship with him, 'cause I only
19 met him a handful of times.

20 Q. Who was your contact at Wheaton?

21 A. From a physician standpoint?

22 Q. Yes.

23 A. I guess the -- they did very little in
24 terms of the procedural volume that would use
25 devices that we sold. So I just -- I didn't spend